

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-6127-Valle

FILED BY AR D.C.

UNITED STATES OF AMERICA

vs.

JEAN JETHRO ALEXANDRE,

Feb 24, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

Defendant.

/

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? NO.
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? NO.
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? NO.
4. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? NO
5. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? NO

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY AR D.C.

United States of America
v.
JEAN JETHRO ALEXANDRE,

Case No.

25-mj-6127-Valle

Feb 24, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FIL*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 20, 2025 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:*Code Section*
18 U.S.C. § 922(g)(5)*Offense Description*

Possession of a firearm by an alien illegally or unlawfully in the United States.

This criminal complaint is based on these facts:

See Attached Affidavit.

 Continued on the attached sheet.

Complainant's signature

Ashley Agrait, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/24/2025

Judge's signature

City and state: Fort Lauderdale, Florida

ALICIA O. VALLE, U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ashley Agrait, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have served in this capacity since December 2022. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request an arrest warrant. I am currently assigned to the Public Corruption Squad of the FBI’s Miami Division. As part of my duties, I investigate violations of federal law involving fraud, Hobbs Act robberies, public corruption, firearms, and identity theft, among other offenses. I have received training in federal criminal statutes relating to these and other offenses, as well as training on how to conduct investigations of these and other offenses. Prior to working as an FBI Special Agent, I served as an FBI Tactical Specialist (TS) for approximately nine (9) years. During my tenure as a TS, I assisted in the investigations involving fraud against the government, business email compromises, financial fraud involving account takeovers, and violent crimes. I was selected and served as an Assistance Team Lead for FBI Miami Hazardous Evidence Response Team, receiving in-depth training on the proper execution of search warrants, including photography, sketching, collection, and preservation of evidence.

2. I submit this affidavit in support of a criminal complaint against Jean Jethro Alexandre (“ALEXANDRE”). As explained below, there is probable cause to believe that, on or about February 20, 2025, in Broward County, in the Southern District of Florida, ALEXANDRE violated Title 18, United States Code, Section 922(g)(5), that is, possession of a firearm by an alien illegally or unlawfully in the United States.

3. The facts contained in this Affidavit are based on my personal knowledge, as well as information relayed to me by other law enforcement officials involved in this investigation. I have not included in this affidavit every fact known to me about this investigation. Rather, I have included only the facts that are sufficient to establish probable for the issuance of a criminal complaint against ALEXANDRE for the above-described criminal violation.

PROBABLE CAUSE

Background

4. On February 19, 2025, United States Magistrate Judge Alicia O. Valle signed a Search and Seizure Warrant (Form AO 93), including Attachments A and B thereto (hereinafter, “Search Warrant 1”), which was supported by an Application for a Warrant by Telephone or Other Reliable Electronic Means (Form AO 106A) (hereinafter, “Warrant Application 1”) and an Affidavit attested to by me in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime on February 19, 2025, which included Attachments A and B (hereinafter, “Affidavit 1”). Warrant Application 1, Affidavit 1, and Search Warrant 1 are presently filed with the Court under seal pursuant to a Sealed Order.

5. Search Warrant 1 authorized law enforcement to: (a) search the premises of 10291 Sweet Bay Street, Plantation, Florida 33324 (hereinafter, the “TARGET PREMISES”), including the residence thereon at which ALEXANDRE resided, as described in more detail in Attachment A thereto; and (b) seize evidence of, and property designed for use, intended for use, or used in committing, violations of Title 18, United States Code, Sections 371 (conspiracy to defraud the United States and receive illegal remunerations), 1028A(a)(1) (aggravated identity theft), 1343 (wire fraud), 1347 (health care fraud), 1349 (conspiracy to commit health care fraud and wire fraud), and Title 42, United States Code, Sections 1320a-7b(b)(1)(A) (receipt of illegal

remunerations) and 1320a-7b(b)(2)(A) (payment of illegal remunerations) (collectively, the “Health Care Fraud Offenses”), as described in more detail in Attachment B thereto.

February 20, 2025 Search of the TARGET PREMISES

6. On February 20, 2025, at approximately 6:00 a.m., federal agents of the FBI executed Search Warrant 1 at the TARGET PREMISES.

7. During the execution of Search Warrant 1 at the TARGET PREMISES, FBI agents made initial contact with ALEXANDRE as he was exiting the residence at the TARGET PREMISES as instructed by law enforcement. In connection with conducting a safety clear of the TARGET PREMISES, FBI agents asked ALEXANDRE standard questions, which included whether there were any additional persons, children, animals, and firearms in the residence. With respect to the firearms, ALEXANDRE stated that there were two firearms in the residence, one firearm located in a closet, which FBI determined was a closet in the master bedroom (hereinafter, the “His Master Closet”); and another firearm located on the top of a dresser, which FBI also determined was in the master bedroom next to the TV.

8. Thereafter, in connection with the safety clear and execution of Search Warrant 1, FBI agents searched the His Master Closet and found within a drawer located therein a Ruger 9mm model American Pistol, bearing serial number 862-03411 (hereinafter, the “FIREARM”).¹ The FIREARM was found loaded with rounds of 9 mm ammunition. The FIREARM (identified as item 15) and ammunition (identified as item 15A) found during the execution of Search Warrant 1 were photographed, and three such photographs are reproduced below:

¹ The FBI also found a second firearm on the dresser next to the TV in the master bedroom, as described by ALEXANDRE.





9. The His Master Closet, including the shelf on which the FIREARM was found, contained articles of male clothing. Notably, the His Master Closet did not contain any female clothing. A separate closet within the Master Bedroom area of the TARGET PREMISES contained female clothing and other personal female items.

10. Additionally, in the His Master Closet, the FBI found a hard plastic case for the FIREARM, which contained a magazine loaded with rounds of 9 mm ammunition and an "Instruction Manual for Ruger American Pistol" (hereinafter, the "FIREARM CASE"). The FIREARM CASE (identified as item 17) found during the execution of Search Warrant 1 was photographed, and two such photographs are reproduced on the next page of this Affidavit:



11. During the continued execution of Search Warrant 1, which authorized the search of any vehicles located on the TARGET PREMISES, the FBI searched a model year 2023 Bentley Flying Spur bearing Vehicle Identification Number (VIN) SCB6ZG3PC004752 (hereinafter, the “Bentley”), which was located on the TARGET PREMISES at the time of the search.² The Bentley was validly registered to ALEXANDRE with the Florida Department of Motor Vehicles.

12. During the search of the Bentley at the TARGET PREMISES, the FBI found in the glove compartment a document titled “FIREARM BILL OF SALE.” The FIREARM BILL OF SALE, which was completed by hand, reflected in Section 1, titled “Buyer,” ALEXANDRE’s full name, date of birth, and Driver’s License Number, as the purchaser of the FIREARM. The manufacturer, model, caliber, and serial number reflected on the FIREARM BILL OF SALE was a Ruger, American Pistol, 9mm, assigned serial number 862-03411 (*i.e.*, the FIREARM). The FIREARM BILL OF SALE reflected in Section 2, titled “Seller,” the name of “Jose v. Pereira” with his date of birth, and Driver’s License Number. The FIREARM BILL OF SALE was dated July 17, 2020, and was notarized by a Florida notary public. An image of the FIREARM BILL OF SALE is reproduced on the next page of this Affidavit:

² An inventory search of the Bentley was also conducted in connection with the seizure of the Bentley pursuant to a Warrant to Seize Property Subject to Forfeiture (AO 109), signed by United States Magistrate Judge Alicia O. Valle on February 19, 2025 (the “Seizure Warrant”). The Seizure Warrant, and the application and affidavit in support thereof, is presently filed with the Court under seal pursuant to a Sealed Order.

FIREARM BILL OF SALE

SECTION 1: Buyer – Complete this section only. Do not skip any fields! Remember to sign and date this section of the form when you are done.

FULL NAME <i>Jean JETHRO Alexandre</i>		DATE OF BIRTH <i>03-06-1981</i>
ADDRESS <i>41 SE 5th ST UNIT # 2103</i>		
CITY <i>Miami</i>	STATE <i>FL</i>	ZIP <i>33131</i>
PHONE NUMBER <i>714 204 9956</i>	DRIVER'S LICENSE # <i>A425-47081-0860</i>	
PERMIT NUMBER <i>N/A</i>	<input type="checkbox"/> PERMIT TO PURCHASE <input type="checkbox"/> PERMIT TO CARRY	

Buyer agrees to the terms and conditions set forth and listed on this document. Buyer assumes all responsibility when transfer of ownership is complete. Buyer acknowledges that he/she is not prohibited from possessing a firearm by law. Buyer acknowledges that he/she is at least 18 years or 21 years or older. Buyer acknowledges and understands that he/she will read the owner's manual. Buyer understands the firearm is sold AS-IS and no warranty is implied or given. Buyer acknowledges that the seller is not responsible for any damages incurred or caused by the use of this firearm.

BUYER SIGNATURE <i>J</i>	DATE <i>07/17/20</i>
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SECTION 2: Seller – Complete this section and section 3. Do not skip any fields.

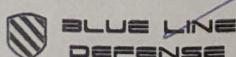
MANUFACTURER <i>Rugger</i>	MODEL NUMBER <i>American Pistol</i>	SERIAL NUMBER <i>862-034111</i>
CALIBER <i>9mm Luger</i>	DESCRIPTION	

SECTION 3: Seller – Complete this section and section 2. Do not skip any fields. Remember to sign and date this section of the form when you are done.

FULL NAME <i>Jose V Pereira</i>	DATE OF BIRTH <i>03-24-74</i>
ADDRESS <i>410 SE 2nd St # 102</i>	
CITY <i>Hallandale</i>	STATE <i>FL</i>
PHONE NUMBER <i>954 479 4900</i>	DRIVER'S LICENSE # <i>F660 438 741040</i>
PERMIT NUMBER <i>W1083530</i>	<input type="checkbox"/> PERMIT TO PURCHASE <input type="checkbox"/> PERMIT TO CARRY

Seller acknowledges this firearm is not stolen and is the legal owner of the firearm listed. If it can be shown now or in the future that the arm was stolen prior to the date listed on this form, seller agrees to refund the buyer the full purchase price. Seller advises buyer firearm is sold AS-IS and no warranty is expressed or implied. Seller assumes no responsibility for the firearm after transfer of ownership and disclaims all responsibility for consequential and/or incidental damages or any losses arising from the use of the firearm.

SELLER SIGNATURE <i>S. Carnacho</i>	DATE <i>07-17-20</i>
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©2012 Blue Line Defense. Blue Line Defense accepts no responsibility for the use of this form or the transfer of firearm ownership. You are responsible for following all local, state, and federal laws.



Samuel Carnacho
Commission # GG 192677
Expires: March 6, 2022
Bonded thru American Notary

13. In the driver's side door compartment of the Bentley, the FBI found ALEXANDRE's Haitian passport, among other items attributable to ALEXANDRE.

14. A Firearms Trace Summary by the Bureau of Alcohol, Tobacco, Firearms and Explosive (ATF) showed that Jose Pereira was the original purchaser of the firearm on July 16, 2020—the day before the date of the sale from Jose Pereira to ALEXANDRE that is reflected on the Firearm Bill of Sale.

15. In addition to the FIREARM, the execution of Search Warrant 1 resulted in the seizure of evidence of, and property designed for use, intended for use, or used in committing, the Health Care Fraud Offenses at the TARGET PREMISES and elsewhere. Such tangible evidence included, but was not limited to: prescription drugs prescribed to individuals not residing in the TARGET PREMISES; ledgers, notes, and other records documenting payments to and from individuals and entities (including pharmacies) associated with a medical facility that is associated with ALEXANDRE and his spouse; personally identifiable information (PII) of medical professionals and other third persons not residing at the TARGET PREMISES; and approximately \$430,000 in U.S. currency.

ALEXANDRE's Immigration Status in the United States

16. Based upon a review of immigration records, ALEXANDRE is a native and citizen of Haiti assigned alien registration number 096100406. ALEXANDRE has the immigration status of an alien who is in the United States illegally or unlawfully.

17. More specifically, pursuant to an Order of an immigration judge, dated October 16, 2006, ALEXANDRE was ordered removed from the United States to Haiti on the charge of entering the United States without inspection, admission or parole, in violation of Section 212(a)(6)(A)(i) of the Immigration and Naturalization Act (hereinafter, the "10/16/06 Order").

ALEXANDRE appealed the 10/16/06 Order, and his appeal was denied in an Order dated August 5, 2008.

18. On February 20, 2025, the United States Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), encountered ALEXANDRE at the TARGET PREMISES and detained him in the custody of DHS/ICE pursuant to a Warrant of Removal/Deportation, dated February 20, 2025, for the removal of ALEXANDRE based upon the 10/16/06 Order (hereinafter, the “02/20/25 Removal Warrant”). ALEXANDRE is presently in DHS/ICE custody pending removal from the United States pursuant to the 02/20/25 Removal Warrant.

Seizure of the FIREARM

19. Based upon probable cause that the FIREARM was evidence of a violation of possession of a firearm by an alien illegally or unlawfully in the United States (18 U.S.C. § 922(g)(5)), and was illegally possessed by ALEXANDRE in violation of the same, FBI seized the FIREARM during the execution of Search 1 Warrant on February 20, 2025 and transported it to a secure evidence room at the FBI Miami Field Office in Miramar, Florida.

20. On February 21, 2025, United States Magistrate Judge Alicia O. Valle signed a Search and Seizure Warrant (Form AO 93), including Attachments A and B thereto (“Search Warrant 2”), which was supported by an Application for a Warrant by Telephone or Other Reliable Electronic Means (Form AO 106A) (the “Warrant Application 2”) and an Affidavit attested to by me in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime on February 21, 2025, which included Attachments A and B (the “Affidavit 2”). Warrant Application 2, Affidavit 2, and Search Warrant 2 are presently filed with the Court under seal pursuant to a Sealed Order.

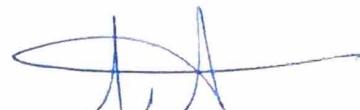
21. Search Warrant 2 authorized law enforcement to seize the FIREARM. The FBI executed Search Warrant 2 on February 21, 2025.

22. Based upon my training and experience, and discussion with other federal law enforcement, the FIREARM was manufactured outside of the State of Florida.

CONCLUSION

23. Based on facts set forth above, I respectfully submit that there is probable cause to believe that on or about February 20, 2025, in Broward County, in the Southern District of Florida, ALEXANDRE committed a violation of Title 18, United States Code, 922(g)(5), that is, possession of a firearm by an alien illegally or unlawfully in the United States.

FURTHER AFFIANT SAYETH NAUGHT.



Ashley Agrait, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime on this 24th day of February, 2025.



ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE